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Attorneys for Defendant

MENZIES AVIATION, INC., DOING BUSINESS AS MENZIES

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RENALDO NAVARRO,

Plaintiff,

vs.

MENZIES AVIATION, INC., DOING
BUSINESS AS MENZIES; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 3:19-CV-08157-VC

Honorable Vince Chhabria

**STIPULATION TO CONTINUE
DISPOSITIVE MOTION HEARING DATE
TO NOVEMBER 19, 2020 AND
[PROPOSED] ORDER**

State Court Action Filed: 10/23/19
Action Removed: 12/16/19

1 Plaintiff Renaldo Navarro and Defendant Menzies Aviation, Inc. hereby stipulate to
2 move the last day to hear a dispositive motion, currently scheduled for November 5, 2020, to
3 November 19, 2020, as follows:

4 1. On July 15, 2020, during the Further Case Management Conference, this Court
5 vacated the trial date the parties had previously set during the March 11, 2020 Case Management
6 Conference in light of the continuing uncertainty related to the COVID-19 pandemic. During
7 that same Further Case Management Conference, the Court and the Parties agreed to move the
8 original last day to hear a dispositive motion from October 1, 2020 to November 5, 2020.

9 2. Based on the November 5, 2020 hearing date, pursuant to Northern District of
10 California Local Rule 7-2(a), the last day to file any dispositive motion would be October 1,
11 2020.

12 3. In anticipation of the October 1, 2020 filing date, counsel for Menzies had begun
13 preparing Menzies' motion. However, during the week of September 21, 2020, counsel for
14 Menzies became very ill and lost most of that workweek and the first part of the workweek
15 beginning September 28, 2020 to illness and recovering from it, which prevented counsel from
16 being able to complete Menzies' contemplated motion for summary judgment by the October 1,
17 2020 filing deadline.

18 4. Because there is no trial date in this matter and neither party will be prejudiced by
19 affording Menzies additional time to file a dispositive motion to account for the time lost by
20 counsel to illness, Menzies requested and Plaintiff has agreed to move the motion hearing
21 deadline to November 19, 2020, which will provide counsel for Menzies time to complete
22 Menzies' motion and file it pursuant to the notice requirements of Local Rule 7-2(a).

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1 THE PARTIES THEREFORE STIPULATE that the current last day to hear a dispositive motion
2 of November 5, 2020 shall be vacated and rescheduled to November 19, 2020.
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4 Dated: October 2, 2020

LIBERATION LAW GROUP, P.C.

5 By: /s/ Arlo Garcia Uriarte
6 Arlo Garcia Uriarte
7 Attorneys for Plaintiffs

8 Dated: October 2, 2020

FOLEY & LARDNER LLP

9 By: /s/ Christopher Ward
10 Sara Alexis Levine Abarbanel
11 Christopher Ward
12 Attorneys for Defendants
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[PROPOSED] ORDER

The Court has reviewed the Parties' stipulation to move the last day to hear a dispositive motion from November 5, 2020 to November 19, 2020 and agrees the Parties have demonstrated good cause for such relief. Accordingly, the Court hereby orders that the last day to hear a dispositive motion hearing shall be continued from November 5, 2020 to November 19, 2020.

IT IS SO ORDERED.

Dated:

By: _____
Hon. Vince Chhabria
United States District Judge